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Attorneys for Mortgage Fund IVC Trust 2016-RN5

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MORTGAGE FUND IVC TRUST 2016-RN5,

Plaintiff,

vs.

DEWEY D. BROWN; REPUBLIC SILVER
STATE DISPOSAL, INC. DBA REPUBLIC
SERVICES; LILLIAN R. BROWN; SATICOY
BAY LLC SERIES 2175 CLEARWATER
LAKE; DOE INDIVIDUALS I-X, inclusive, and
ROE CORPORATIONS I-X, inclusive,

Defendants.

Case No. 2:17-cv-02309-KJD-BNW

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO RESPOND TO
ORDER, ECF No. 51**

(FIRST REQUEST)

Mortgage Fund IVC Trust 2016-RN5 (the **Trust**), and Saticoy Bay LLC Series 2175 Clearwater Lake (**Saticoy Bay**) hereby stipulate and agree to extend the Trust's deadline to move for judgment on its judicial foreclosure claim or otherwise dispose of its remaining claim by two weeks, to **February 20, 2020**. The Trust's current deadline to dispose of or otherwise provide a status report to the court on its remaining claim, per the court's order at ECF No. 51, is February 6, 2020.

Plaintiff does not at this time intend to waive, drop, or dismiss the judicial foreclosure claim. However, in recognition of the fact that an appeal on the quiet title component of the claim may impact the outcome of the ability for plaintiff to obtain clear title through foreclosure, the parties are engaging in discussion to determine if an agreement can be reached regarding how foreclosure should be handled. Accordingly, the parties: (1) provide this stipulation as a status report; and (2)

1 stipulate and agree that they will file a status report, stipulation, or other appropriate motion setting
2 forth their agreement and/or respective positions by February 20, 2020.

3 This is the parties' first request for an extension of this deadline and is not intended to cause
4 any delay or prejudice to any party.

5 DATED this 5th day of February, 2020.

6 **AKERMAN LLP**

7
8 /s/ Jamie K. Combs

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6 **LAW OFFICES OF MICHAEL F. BOHN, ESQ., LTD.**

7
8 /s/ Michael F. Bohn

9 MICHAEL F. BOHN, ESQ.

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12 Nevada Bar No. 12294

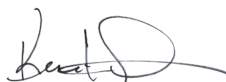
13 2260 Corporate Circle, Suite 480

14 Henderson, NV 89074

15 *Attorneys for Saticoy Bay LLC Series 2175*
16 *Clearwater Lake*

17 **ORDER**

18 **IT IS SO ORDERED:**

19 

20 **UNITED STATES DISTRICT COURT JUDGE**

21 DATED: February 10, 2020